

Comments on Interim Removal Action Scope of Work (IRA SOW):

1. Paragraph 7: The IRA SOW does not provide for regulatory review and approval of the IRA Work Plan. Respondents should provide for regulatory review and approval of the IRA Work Plan, or as an alternative, the Respondents should expand the detail provided in the IRA SOW submitted so that it incorporates all the detailed information normally contained in a detailed work plan.
2. Paragraph 9(e): The IRA SOW does not describe the type, location, and number of confirmatory samples that will be collected, or the benchmarks the analysis results will be compared to. The IRA SOW should provide this information.
3. Paragraph 12(a): There is no provision for signs along the Intracoastal Waterway to reduce the potential for unauthorized access. Signs along the Intracoastal Waterway should be installed, in addition to the signs on the boundary fence.
4. Paragraph 15: There is no specific provision for regulatory review and approval of the Interim Removal Action Report. The IRA SOW should be revised to provide for regulatory approval.

Comments on Site Investigation and Removal Action Scope of Work (SI/RA SOW):

1. Paragraph 13: The SI/RA SOW proposes to conduct activities in accordance with all applicable TCEQ TRRP and VCP guidance. In addition, the activities should also be in accordance with relevant EPA guidance to facilitate the NPL delisting process.
2. Paragraph 17: The borings to evaluate the cap are to be analyzed for Atterburg Limits and percent passing a 200 sieve. A representative soil sample from each borings should also be analyzed for permeability to evaluate the potential for migration through the cap.